



February 26, 2013  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: All Access Inc.  
CPNI Certification  
EB Docket No. 06-36; CY2012**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2012 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of All Access Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant to All Access Inc.

cc: Ana Carbajal - All Access  
file: All Access - FCC - Other  
tms: FCx1301

Enclosures  
ST/im



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ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE


EB DOCKET 06-36

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|  |                    |
|--|--------------------|
| Annual 64.2009(e) CPNI Certification for:      | Calendar Year 2012 |
| Name of Company covered by this certification: | All Access Inc.    |
| Form 499 Filer ID:                             | 826848             |
| Name of Signatory:                             | Angharad Jassan    |
| Title of Signatory:                            | Treasurer          |

I, Angharad Jassan, certify and state that:

1. I am Treasurer of All Access Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification ,as Attachment A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Angharad Jassan, Treasurer  
All Access, Inc.

February 21 2013  
\_\_\_\_\_  
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

Attachment A  
Statement of CPNI Procedures and Compliance

**All Access, Inc.**

Calendar Year 2012

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
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All Access, Inc.

Statement of CPNI Procedures and Compliance

All Access Inc. ("All Access" or "Company") operates solely as a provider of long distance prepaid debit card services sold via the internet , via telemarketing or in retail stores not owned or operated by the Company. For cards sold at retail locations, the Company does not have any subscribed relationship with customers and does not have any identifying information regarding customers. Web-based sales do provide the Company an opportunity to build a subscribed relationship with its customers.

All Access does not use or permit access to CPNI for marketing purposes. All Access' marketing efforts are mass advertising, including internet advertising, and point of sale, and do not include the use of CPNI. Should All Access expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company however does maintain prepaid debit call detail records. The Company ensures that all access to call detail information is safeguarded from improper use or disclosure by employees and has in place methods to discover and protect against attempts by third parties to gain unauthorized access to this information. Call detail is not available and therefore is not disclosed at retail locations. Because the Company does not have any information regarding customers who purchase retail cards, the only authentication method available to the Company is to require that the customer provide the 10 digit PIN on the back of the card when calling for customer service.

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Customers who purchase prepaid service via the internet are requested to establish a password on-line. Account information, including call detail, is available to customers of on-line service. In the event a customer loses or forgets the password established, the company has an authentication procedures to allow the customer to set up a new password. Information is only provided to customers via the email address established when service was initiated. Furthermore, the Company notifies customers via the email account of record whenever a password or other account information is changed without revealing the changed information.

Call detail information is only provided to government agencies or law enforcement, in writing, as a result of a subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and should such an event occur, will record all breaches discovered and notifications made to the United States Secret Service and the FBI. Attempts will be made to the extent the Company has such information, to customers.

All Access has not taken any actions against data brokers in the last year.

All Access did not receive any customer complaints about the unauthorized release of CPNI in calendar year 2012.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.